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Commonwealth of Kentucky
Division for Air Quality

PERMIT STATEMENT OF BASIS

TITLE V (PROPOSED) NO. V-99-014
SAFETY-KLEEN SYSTEMS, INC. - NEW CASTLE RECYCLE CENTER
SMITHFIELD, KENTUCKY
STUART ECTON, B.S. CHEMICAL ENGINEERING/ REVIEWER
PLANT I.D. # 104-1780-0005
APPLICATION LOG # F912

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APPLICABLE REGULATIONS:

401 KAR 59:015, New indirect heat exchangers.
401 KAR 63:680 (40 CFR 63 Subpart DD), National Emission Standards for Hazardous Air Pollutants from off-site Waste and Recovery Operations.
401 KAR 63:900 (40 CFR 63 Subpart OO), National Emission Standards for Tanks-Level 1.
401 KAR 63:920 (40 CFR 63 Subpart PP), National Emission Standards for containers.
401 KAR 57:035 (40 CFR 61 Subpart V), National Emission Standards for Equipment Leaks.
401 KAR 59:485 (40 CFR 60 Subpart Kb)Standards of performance for volatile organic liquid storage vessels for which construction, reconstruction or modification commenced after July 23, 1984.

COMMENTS RECEIVED/ RESPONSE TO COMMENTS:

Only two comments were received pursuant to the publication of the draft permit. Both were submitted by Safety Kleen and concerned the two small (8.4mmBTU/hr, 16.7mmBTU/hr) natural gas/#2 fuel oil fired boilers. The draft permit was unclear as to the semiannual opacity reading requirements. The permit states that the boilers will be deemed in compliance with the opacity standard if natural gas is being used as the fuel. This seemingly exempts the boilers from the semiannual opacity readings to demonstrate compliance. However, it was not the Division's intent to exempt the boilers from the semiannual readings while burning natural gas. The wording of the condition has been modified to make clear that semiannual opacity readings are required regardless of the fuel being burned.

The only other issue raised by the company was the requirement to record the amount of natural gas being burned on a daily basis. After considering Safety Kleen's comment, the Division agrees that this is a somewhat onerous requirement and has decided to relax it to a weekly rather than a daily basis.